1	Robert W. Turken	
2	Mitchell E. Widom Scott N. Wagner	
3	BILZIN SUMBERG BAENA PRICE &	
4	AXELROD LLP 1450 Brickell Avenue, Suite 2300	
	Miami, Florida 33131-3456	
5	Telephone: 305-374-7580 Facsimile: 305-374-7593	
6	E-mail: rturken@bilzin.com; mwidom@	@bilzin.com;
7	swagner@bilzin.com	
8	Stuart H. Singer	
9	BOIES, SCHILLER, & FLEXNER LLP 401 East Las Olas Boulevard, Suite 1200	
10	Fort Lauderdale, Florida 33301	
	Telephone: (954) 356-0011 Facsimile: (954) 356-0022	
11	E-mail: ssinger@bsfllp.com	
12	Comment from Divingtiffor Totals Double Comments on	and Table Date Dual and Manage and Law The
13	AASI Creditor Liquidating Trust, by and thro	and Tech Data Product Management, Inc.; The ugh Kenneth A. Welt, Liquidating Trustee;
14	[Additional counsel listed in signature page]	
15		
16		S DISTRICT COURT
17		RICT OF CALIFORNIA CISCO DIVISION)
18	In re: TFT-LCD (FLAT PANEL)	CASE NO. M:07-md-01827-SI
	ANTITRUST LITIGATION	MDL No. 1827
19		CASE NOS. 3:10-cv-05458-SI;
20	This Document Relates to: SB Liquidation Trust v. AU Optronics	3:11-cv-00829-SI; 3:11-cv-02225-SI; 3:11-cv-02495-SI; 3:11-cv-03763-SI;
21	Corp., et al., 3:10-cv-05458-SI	3:11-cv-03856-SI; 3:11-cv-04119-SI;
22	MetroPCS Wireless, Inc. v. AU Optronics	3:11-cv-05765-SI; 3:11-cv-05781-SI; 3:11-cv-06241-SI; 3:12-cv-01426-SI;
23	Corp., et al., 3:11-cv-00829-SI	3:10-cv-05625-SI; 3:10-cv-03205 SI;
24	Office Depot, Inc. v. AU Optronics Corp.,	STIPULATION AND [PROPOSED] ORDER SETTING TRACK 2
25	et al., 3:11-cv-02225-SI	DEADLINES
26	Jaco Electronics, Inc. v. AU Optronics Corp., et al., 3:11-cv-02495-SI	
27	23.4.4.5.5.5.7.5.7.5.	
28		

1	
2	Interbond Corp. of America v. AU Optronics Corp., et al., 3:11-cv-03763-SI
3	Schultze Agency Services, LLC, on behalf
4	of Tweeter Opco, LLC and Tweeter Newco, LLC, v. AU Optronics Corp., et
5	al.,3:11-cv-03856-SI
6	P.C. Richard & Son Long Island Corp., et
7	al. v. AU Optronics Corp., et al., 3:11-cv-04119-SI
8	Tech Data Corp., et al. v. AU Optronics
9	Corp., et al., 3:11-cv-05765-SI
10	The AASI Creditor Liquidating Trust, by
11	and through Kenneth A. Welt, Liquidating Trustee v. AU Optronics Corp., et al.,
12	3:11-cv-05781-SI
13	CompuCom Systems, Inc. v. AU Optronics
14	Corp., et al., 3:11-cv-06241-SI
15	NECO Alliance LLC v. AU Optronics Corp., et al., 3:12-cv-01426-SI
16	Alfred H. Siegel, as Trustee of the Circuit
17	City Stores, Inc. Liquidating Trust v. AU
18	Optronics Corp., et al., 3:10-cv-05625-SI
19	Tracfone Wireless, Inc. v. AU Optronics Corporation, et al., 3:10-cv-03205-SI
20	-

Plaintiffs in the above-captioned cases (collectively, "Track 2 cases") and Defendants in the Track 2 cases (respectively, "Plaintiffs" and "Defendants," collectively, "Parties") hereby stipulate as follows:

WHEREAS the Track 2 cases have been proceeding with pretrial preparation in accordance with the Court's Order dated September 6, 2013 (Dkt. No. 8589) and the deadline for service of reply expert reports for Defendants in the Track 2 cases is presently January 27, 2014;

21

22

23

24

25

26

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

WHEREAS, on October 31, 201	3, Defendants submitted	opposition expert	reports from
their experts in the Track 2 Cases;			

WHEREAS counsel for Plaintiffs have requested and counsel for Defendants have agreed that Plaintiffs should receive a three-week extension for submitting their reply expert reports, with the result that all other unexpired deadlines pertaining to expert discovery would be extended to preserve approximately the same number of days previously provided for under the original schedule, as set forth below;

WHEREAS the following extensions for unexpired deadlines in the Track 2 cases will not prejudice any of the Parties or the Court because the trial dates have not been scheduled for any of these cases;

WHEREAS the Court's December 12, 2013 Stipulation and Order Setting Revised Deadlines in Track 2 Re: Summary Judgment Motion Lists (Dkt. No. 8833) set forth a schedule for the Parties to meet and confer and set January 13, 2014 as the deadline for the Parties to file with the Court a Joint List of Proposed Summary Judgment Motions and Proposed Schedule for Summary Judgment Filings; and

WHEREAS the Parties have met and conferred and determined that the Parties would benefit from additional time to (1) meet and confer regarding the Proposed List of Summary Judgment Motions and Proposed Schedule for same; and (2) to file with the Court a Joint List of Proposed Summary Judgment Motions and Proposed Schedule for Summary Judgment Filings;

NOW THEREFORE, IT IS HEREBY STIPULATED between counsel for Plaintiffs and counsel for Defendants in the Track 2 cases, and subject to the concurrence of the Court, that the Track 2 cases, other than the *State of Oregon* case and the *Hewlett-Packard* case, will adopt the following Track 2 case schedule:

25

26

27

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Event	Current Date (Under September 6, 2013 Order)	Revised Date
File a Joint List of Proposed Summary Judgment Motions and Proposed Schedule for Summary Judgment Filings	January 13, 2014 ¹	January 27, 2014
Service of reply expert reports	January 27, 2014	February 14, 2014
Service of underlying data and Code	February 4, 2014	February 19, 2014
Service of sur-rebuttal expert reports on downstream pass-on	April 9, 2014	May 15, 2014
Service of underlying data and Code	April 15, 2014	May 20, 2014
Last Day to File Supplemental List of Summary Judgment Motions Based Upon New Information or Issues Raised in the Reply Expert Reports	March 27, 2014	April 21, 2014
Last day to file dispositive Motions	April 25, 2014	June 2, 2014
Close of expert discovery	May 20, 2014	June 25, 2014
Last day to file oppositions to dispositive motions	June 6, 2014	July 14, 2014
Last day to file reply briefs in support of dispositive motions	July 18, 2014	August 25, 2014
Last day for hearing dispositive motions	August 1, 2014	September 12, 2014

IT IS SO STIPULATED.

Dated: January 10, 2014

Respectfully Submitted,

By: /s/Scott N. Wagner ROBERT W. TURKEN MITCHELL E. WIDOM SCOTT N. WAGNER BILZIN SUMBERG BAENA PRICE & AXELROD LLP 1450 Brickell Ave., Suite 2300 Miami, Florida 33131-3456 Telephone: (305) 374-7580 Facsimile: (305) 374-7593

¹ Under December 12, 2013 Stipulation and Order Setting Revised Deadlines in Track 2 Re: Summary Judgment Motion Lists (Dkt. No. 8833).

Case 3:07-md-01827-SI Document 8854 Filed 01/15/14 Page 5 of 13

1	E-mail: rturken@bilzin.com
2	mwidom@bilzin.com swagner@bilzin.com
3	Counsel for Plaintiffs Tech
4	Data Corporation and Tech Data Product
5	Management, Inc. and The AASI Creditor Liquidating Trust, by and through Kenneth A. Welt,
6	Liquidating Trustee
7	
8	By: /s/ Philip J. Iovieno William Isaacson (admitted pro hac vice)
	Melissa Felder (admitted <i>pro hac vice</i>) BOIES, SCHILLER & FLEXNER LLP
9	5301 Wisconsin Avenue NW, Suite 800
10	Washington, DC 20015 Telephone: (202) 237-2727
11	Facsimile: (202) 237-6131 Email: wisaacson@bsfllp.com
12	mfelder@bsfllp.com
13	
	Philip J. Iovieno (admitted <i>pro hac vice</i>) Anne M. Nardacci (admitted <i>pro hac vice</i>)
14	Luke Nikas (admitted pro hac vice)
15	Christopher Fenlon (admitted <i>pro hac vice</i>) BOIES, SCHILLER & FLEXNER LLP
16	10 North Pearl Street, 4th Floor Albany, NY 12207
17	Telephone: (518) 434-0600 Facsimile: (518) 434-0665
18	Email: piovieno@bsfllp.com
19	anardacci@bsfllp.com lnikas@bsfllp.com
	cfenlon@basfllp.com
20	Attorneys for Plaintiffs MetroPCS Wireless, Inc.;
21	Office Depot, Inc.; Interbond Corp. of America; Schultze Agency Services, LLC; P.C. Richard & Son
22	Long Island Corporation; MARTA Cooperative of America, Inc.; ABC Appliance Inc.; Tech Data Corp.
23	and Tech Data Product Management, Inc.; The AASI Creditor Liquidating Trust; CompuCom Systems, Inc.;
24	and NECO Alliance LLC
25	
26	
27	
28	

By:/s/Jerome A	A. Murphy
Jeffrey H. Howard (pr	
Jerome A. Murphy (pr	
CROWELL & MORIN	
1001 Pennsylvania Av Washington, DC 2000	
Telephone: (202) 624	
Facsimile: (202) 628-	
Email: jhoward@crow	
jmurphy@crov	vell.com
Jason C. Murray (CA) Janet I. Levine (CA) Joshua C. Stokes (CA) CROWELL & MORIN	ar No. 94255) Bar No. 220214)
515 South Flower Stre	et, 40th Floor
Los Angeles, CA 900	
Telephone: (213) 622	
Facsimile: (213) 622- Email: jmurray@crow	
jlevine@crowe	
jstokes@crowe	
Kenneth L. Adams (pr	o hac vice)
R. Bruce Holcomb (pr	
Christopher T. Leonard ADAMS HOLCOMB	
1875 Eye Street NW	LLI
Washington, DC 2000	06
Telephone: (202) 580	
Facsimile: (202) 580-	
Email: adams@adams	noicomb.com msholcomb.com
	msholcomb.com
reonardo e adar	inshoreome.com
	s Jaco Electronics, Inc. and Inc., and Plaintiffs' Liaison

Case 3:07-md-01827-SI Document 8854 Filed 01/15/14 Page 7 of 13

			1
			2 3 4 5 6 7 8 9
			3
			4
			5
			6
			7
			8
			9
			10
4 LLP			11
Bilzin Sumberg Baena Price & Axelrod LLP	1450 Brickell Avenue, Suite 2300	95	12 13
Price &	nue, Su	Miami, FL 33131-3456	13
Baena]	cell Ave	ii, FL 3.	14
ımberg	0 Brick	Mian	15 16
ilzin Sı	145		16
Н			17
			18
			19
			20
			21
			22
			23
			24
			25
			26

27

Bv:	/s/ H. Lee Godfrey
<i></i>	/s/ H. Lee Godfrey H. Lee Godfrey Kenneth S. Marks
	Jonathan J. Ross
	Johnny W. Carter SUSMAN GODFREY L.L.P.
	1000 Louisiana Street, Suite 5100
	Houston, TX 77002
	Telephone: (713) 651-9366 Facsimile: (713) 654-6666
	Email: lgodfrey@susmangodfrey.com
	kmarks@susmangodfrey.com
	jross@susmangodfrey.com jcarter@susmangodfrey.com
	Jeaner & susmangouriey.com
	Parker C. Folse III Rachel S. Black
	Jordan Connors
	SUSMAN GODFREY L.L.P.
	1201 Third Avenue, Suite 3800 Seattle, WA 98101-3000
	Telephone: (206) 516-3880
	Facsimile: (206) 516-3883 Email: pfolse@susmangodfrey.com
	rblack@susmangodfrey.com
	jconnors@susmangodfrey.com
	Attorneys for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust

By: /s/ Marc M. Seltzer
By: /s/ Marc M. Seltzer Marc M. Seltzer (54534) Steven G. Sklaver (237612) SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 Facsimile: (310) 789-3150 Email: mseltzer@susmangodfrey.com ssklaver@susmangodfrey.com
Erica W. Harris SUSMAN GODFREY LLP 1000 Louisiana, Suite 5100 Houston, TX 77002-5096 Telephone: (713) 651-9366 Facsimile: (713) 654-6666 Email: eharris@susmangodfrey.com
By: /s/James B. Baldinger Florida Bar No.: 869899 jbaldinger@carltonfields.com Robert L. Ciotti Florida Bar No.: 333141 rciotti@carltonfields.com David B. Esau Florida Bar No.: 650331 desau@carltonfields.com CARLTON FIELDS, P.A. CityPlace Tower – Suite 1200 525 Okeechobee Boulevard West Palm Beach, Florida 33401 Telephone: (561) 659-7070 Facsimile: (561) 659-7368 Counsel for TracFone Wireless, Inc.

By:	/s/ Lee F. Berger
	Holly A. House (State Bar No. 136045)
	Kevin C. McCann (State Bar No. 120874)
	Lee F. Berger (State Bar No. 222756)
	Sean Unger (State Bar No. 231694)
	PAUL HASTINGS LLP
	55 Second Street
	Twenty-Fourth Floor
	San Francisco, CA 94105
	Telephone: (415) 856-7000
	Facsimile: (415) 856-7100
	Email: kevinmccann@paulhastings.com
	hollyhouse@paulhastings.com leeberger@paulhastings.com
	seanunger@paulhastings.com
	scandinger & paumastings.com
	Brad D. Brian (State Bar No. 079001)
	Jerome C. Roth (State Bar No. 159483)
	MUNGER, TOLLES & OLSON LLP
	355 South Grand Avenue
	Los Angeles, CA 90071-1560
	Telephone: (213) 683-9100
	Facsimile: (213) 687-3702
	Email: Brad.Brian@mto.com
	Attorneys for Defendants LG Display Co., Ltd. and LG
	Display America, Inc.
By:	/s/ Stephen P. Freccero
	Stephen P. Freccero (SBN 131093)
	Melvin R. Goldman (SBN 34097)
	Derek F. Foran (SBN 224569)
	MORRISON & FOERSTER LLP
	425 Market Street
	San Francisco, CA 94105
	Telephone: (415) 268-7000
	Facsimile: (415) 268-7522
	Email: mgoldman@mofo.com
	sfreccero@mofo.com
	dforan@mofo.com
	Attorneys for Defendants Epson Imaging Devices
	Corporation and Epson Electronics America, Inc.
	corporation and Epson Electronics Timerica, Inc.

Case 3:07-md-01827-SI Document 8854 Filed 01/15/14 Page 10 of 13

	1	By: /s/ Carl L. Blumenstein Carl L. Blumenstein (State Bar No. 124158)
	2	Carl L. Blumenstein (State Bar No. 124158) Christopher A. Nedeau (State Bar No. 81297)
		Farschad Farzan (State Bar No. 215194)
	3	NOSSAMAN LLP 50 California Street, 34th Floor
	4	San Francisco, CA 94111 Telephone: (415) 398-3600
	5	Facsimile: (415) 398-2438
	6	Email: cnedeau@nossaman.com cblumenstein@nossaman.com
		ffarzan@nossaman.com
	7	Attorneys for Defendants AU Optronics Corporation
	8	and AŬ Optronics Corporation America
	9	
	10	By: /s/ Christopher M. Curran Christopher M. Curran (pro hac vice)
		Martin M. Toto (pro hac vice)
	11	John H. Chung (<i>pro hac vice</i>) WHITE & CASE LLP
9	12	1155 Avenue of the Americas
Miami, FL 33131-3456	13	New York, NY 10036 Telephone: (212) 819-8200
3313	1.4	Facsimile: (212) 354-8113 Email: ccurran@whitecase.com
ni, FL	14	mtoto@whitecase.com
Mian	15	jchung@whitecase.com
	16	Attorneys for Toshiba Corporation, Toshiba Mobile
	17	Display Co., Ltd., Toshiba America Electronic Components, Inc. and Toshiba America Information
		Systems, Inc.
	18	
	19	
	20	
	21	
	22	
	23	
	24	
	25	
	26	
	27	
	28	

1	By: /s/ Neal A. Potischman
2	Neal A. Potischman (SBN 254862) neal.potischman@davispolk.com
3	DAVIS POLK & WARDWELL LLP 1600 El Camino Real
4	Menlo Park, California 94025 Telephone: (650) 752-2000 Facinilar (650) 752-2111
5	Facsimile: (650) 752-2111
6	Counsel for Chi Mei Optoelectronics Corporation (n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
7	and Chi Mei Optoelectronics USA, Inc. for the Office Depot, Inc., Interbond Corp. of America, Schultze
8	Agency Services, LLC, P.C. Richard & Son Long Island Corp., et al., Tech Data Corp., et al., The AAS Creditor Liquidating Trust, CompuCom Systems, Inc.
9	and NECO Alliance LLC Actions Only
10	/a/Michael D. Coott
11	/s/ Michael R. Scott Michael R. Scott (pro hac vice)
12	mrs@hcmp.com Michael J. Ewart (pro hac vice) mje@hcmp.comHILLIS CLARK MARTIN &
13	PĚTERSON P.S.
14	1221 Second Avenue, Suite 500 Seattle, WA 98101-2925
15	Telephone: (206) 623-1745 Facsimile: (206) 623-7789
16	Counsel for Chi Mei Optoelectronics Corporation (n/k/a Innolux Corporation), CMO Japan Co., Ltd.,
17	and Chi Mei Optoelectronics USA, Inc. for the MetroPCS Wireless, Inc. Action Only
18	Metror CS wireless, Inc. Action Only
19	By: /s/ William S. Farmer
20	William S. Farmer (SBN 46694) David C. Brownstein (SBN 141929) Levels B. Algrey (SBN 225712)
21	Jacob P. Alpren (SBN 235713) FARMER BROWNSTEIN JAEGER LLP
22	235 Pine Street, Suite 1300 San Francisco, CA 94104
23	Telephone: (415) 795-2050 Email: wfarmer@fbj-law.com
24	dbrownstein@fbj-law.com jalpren@fbj-law.com
25	Counsel for Chunghwa Picture Tubes, Ltd. in the
26	MetroPCS Wireless Actions Only
27	
28	

1 2 3 4 5	By: /s/Rachel S. Brass Rachel S. Brass (SBN 219301) Joel S. Sanders (SBN 107234) Austin V. Schwing (SBN 211696 GIBSON, DUNN & CRUTCHER LLP 555 Mission Street, Suite 3000 San Francisco, California 94105 (415) 393-8200 / (415) 393-8306 jsanders@gibsondunn.com rbrass@gibsondunn.com
	Attorneys for Defendants Chunghwa Picture Tubes,
7	Ltd. in the BrandsMart, Office Depot, Interbond, Schultze Agency Services, PC Richard, Tech Data,
8	AASI Creditor Liquidating Trust, CompuCom, Viewsonic, and NECO Alliance Actions Only
9	
10	By: <u>/s/ Harrison J. Frahn IV</u>
11	James G. Kreissman (SBN 206740)
12	Harrison J. Frahn IV (SBN 206822) Jason M. Bussey (SBN 227185)
13	Elizabeth A. Gillen (SBN 260667) Melissa D. Schmidt (SBN 266487)
14	SIMPSON THACHER & BARTLETT LLP
15	2475 Hanover Street Palo Alto, California 94304
16	Telephone: (650) 251-5000 Facsimile: (650) 251-5002
17	jkreissman@stblaw.com
18	hfrahn@stblaw.com jbussey@stblaw.com
19	egillen@stblaw.com melissa.schmidt@stblaw.com
20	Attorneys for Defendant HannStar Display
21	Corporation
22	
23	
24	
25	
26	
27	
28	

By: /s/ Jacob R. Sorensen Jacob R. Sorensen (SBN 209134)
John M. Grenfell (SBN 88500)
Fusae Nara (<i>pro hac vice</i>) Andrew D. Lanphere (SBN 191479)
PILLSBURY WINTHROP SHAW PITTMAN LLP 4 Embarcadero Center, 22nd Floor
San Francisco, CA 94111 Telephone: (415) 983-1000
Facsimile: (415) 983-1200 Email: john.grenfell@pillsburylaw.com
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com andrew.lanphere@pillsburylaw.com
Attorneys for Defendants SHARP CORPORATION and
SHARP ELECTRONICS CORPORATION
By:/s/Michael W. Scarborough
By: <u>/s/ Michael W. Scarborough</u> Michael W. Scarborough (SBN 203524) SHEPPARD MULLIN RICHTER & HAMPTON
Four Embarcadero Center, 17th Floor San Francisco, CA 94111
Telephone: (415) 434-9100
Facsimile: (415) 434-3947 Email: mscarborough@sheppardmullin.com
Attorneys for Defendants Samsung SDI America, Inc. and Samsung SDI Co., Ltd.
Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this
document has been obtained from each of the above signatories.
IT IS SO ORDERED.
1/14/14
Dated:Hon. Susan Illston
United States District Judge